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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

AARON SENNE, *et al.*,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF  
BASEBALL, an unincorporated association  
doing business as MAJOR LEAGUE  
BASEBALL, *et al.*,

Defendants.

Case No. CV 14-00608 JCS (consolidated  
with 3:14-cv-03289-JCS)

Hon. Joseph C. Spero

**CLASS ACTION**

**DECLARATION OF ELISE M. BLOOM  
IN SUPPORT OF DEFENDANTS'  
REPLY MEMORANDUM OF LAW IN  
FURTHER SUPPORT OF  
DEFENDANTS' MOTION TO  
EXCLUDE PLAINTIFFS' EXPERT  
DECLARATIONS AND TESTIMONY  
OF J. MICHAEL DENNIS, PH.D.**

1 I, Elise M. Bloom, declare as follows:

2 1. I am a partner at Proskauer Rose, LLP, counsel for all Defendants in this matter.

3 2. I submit this declaration in support of Defendants' Reply Memorandum Of Law  
4 In Further Support Of Defendants' Motion To Exclude Plaintiffs' Expert Declarations And  
5 Testimony Of J. Michael Dennis, Ph.D.

6 3. I have personal knowledge of the facts contained in this declaration, and if called  
7 to testify, I could and would testify competently thereto.

8 4. Attached hereto as **Exhibit 1** is a true and correct copy of relevant excerpts of Dr.  
9 J. Michael Dennis's Deposition, taken on September 20, 2021 ("Ex. 1").

10 5. Attached hereto as **Exhibit 2** is a true and correct copy of relevant excerpts of Dr.  
11 Brian Kriegler's Deposition, taken on September 22, 2021 ("Ex. 2").

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13  
14 I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day  
15 of December, 2021.

16 \_\_\_\_\_  
17 */s/ Elise M. Bloom*

18 Elise M. Bloom  
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